

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JUAN J. PEDRAZA MORA and
GLORIA E. BATISTA MOLINA

DEBTOR

Case No. 14-01392-ESL

Chapter 12

MOTION FOR AUTHORIZATION TO CONSIGN FUNDS REQUESTED BY THE IRS

NOW COMES Vaquería Tres Monjitas, Inc., (VTM), through undersigned counsel, and respectfully states and prays:

- 1.- VTM received a LEVY from the IRS to retain and pay the IRS sums of moneys, from the proceeds of sales raw milk by debtors to VTM (docket 63).
- 2.- VTM filed a motion (docket No. 62) for a determination as to whom to pay the proceeds of the purchase of raw milk made by VTM to the debtor, but said motion was denied, without prejudice, by this Honorable Court, as it was deemed to be a request for an advisory opinion (docket No. 66).
- 3.- The matter of to whom the moneys from the proceeds of the purchase of raw milk should be paid, is a matter to be litigated between the parties: the debtor and the IRS, VTM does NOT, and cannot take sides in this matter.
- 4.- VTM request authorization, pursuant to Local Bankruptcy Rules 7067-1 to CONSIGN the amount requested by the IRS (\$4,895.85) with this Honorable Court.

IT IS THEREFORE respectfully requested that this Honorable Court AUTHORIZE VTM to deposit with this Honorable Court the sum of \$4,895.85, requested by the IRS

In San Juan, Puerto Rico, February 3rd., 2015.

CERTIFICATE OF SERVICE:

This motion shall be served on those parties that appear in the Electronic System of the Clerk's Office to receive electronic notices, including debtors' counsel Mr. Victor Gratacós, Esq., and chapter 12 trustee Mr. José R. Carrión, Esq. And by mail to the IRS: Mr. Oscar P. Fournier González, City View Plaza II, 48 Carr. 165 Suite 2000, Guaynabo, PR 00968-8000000.

/s/MAXIMILIANO TRUJILLO-GONZALEZ, ESQ.
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/s/MAXIMILIANO TRUJILLO-GONZALEZ, ESQ.

RESPONSE TIME REQUIRED BY LOCAL BANKRUPTCY RULE 9013-1(c)(1)

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Federal Rule of Bankruptcy Procedure 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

/s/Maximiliano Trujillo-González